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COMMITTEE OF EXPERTS ON THE  
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the  
Transport of Dangerous Goods  
(Fifteenth session,  
Geneva, 29 June-10 July 1998  
agenda item 5 (f))

MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS

Diagnostic specimens for routine screening  
Application of the exemption provided in Section 2.6.3.3.2

Transmitted by the Expert from Canada

Background

1. In Canada the Canadian Red Cross corporation has developed a nation-wide blood collection system to supply the needs of our hospitals. To ensure that the blood provided to the hospitals is free from pathogens specimens are transported by air to various laboratories throughout the country for routine screening. Prior to 1997 these specimens were identified as diagnostic specimens

*'where a relatively low probability exists that pathogens of risk groups 2 or 3 are present. Specimens transported for the purpose of routine screening tests or initial diagnosis for other than the presence of pathogens fall within this group.'* (Paragraph 2;6.5.3 b) of the International Civil Aviation Organization Technical Instructions (ICAO TI's)).

2. Section 2;6.5.5 of the ICAO TI's provides an exemption from the provisions for infectious substances for those diagnostic specimens described in Paragraph 2;6.5.3 b) if the following conditions are met:

- the primary receptacles do not contain more than 500 ml;
- the outer packaging does not contain more than 4 L;
- the primary receptacles are leakproof;
- the outer packaging is in accordance with Packing Instruction 602, except that the design type tests provided in Part 7, Chapter 6 do not apply. However, each completed package must be capable of successfully passing the drop test described in Part 7;6.2.2, except that the height of the drop must not be less than 1.2 m; and
- the package must be marked 'Diagnostic Specimen'.

3. With the 1997 edition of the International Air Transport Association (IATA) Dangerous Goods Regulations IATA issued an interpretation on Paragraph 2;6.5.3 b) that effectively made these specimens subject to the full regulatory requirements prescribed for Infectious Substances. The IATA interpretation indicated that the words 'for other than the presence of pathogens' applied to both 'specimens for routine screening test' and 'specimens for initial diagnosis'.

4. Analysis for the presence of pathogens is precisely why the Canadian Red Cross arrange for the examination of their specimens. The application of such an interpretation would mean that the numerous daily shipments of the Canadian Red Cross, as well as those of other agencies involved in similar activities, would fall into Paragraph 2;6.5.3 a) which stipulates that they are to be transported as infectious substances, subject to the full requirements of the ICAO TI's.

5. The Canadian member raised this issue during a 1997 Working Group meeting of the ICAO Dangerous Goods Panel and at that time many members believed that the words 'for other than the presence of pathogens' were never intended to modify the words 'for the purpose of routine screening tests'. The Working Group recommended that, as the Recommendations on the Transport of Dangerous Goods Model Regulations establish the provisions in this area, it would be appropriate to have the UN Committee of Experts review the wording and make a ruling regarding the text. The Canadian member was requested to initiate such action.

#### Proposal

6. Remedy any potential for misinterpreting the requirements with respect to 'specimens for routine screening' by amending Paragraph 2.6.3.1.3 (b) of the Recommendations on the Transport of Dangerous Goods Model Regulations as follows:

'2.6.3.1.3 (b) Those where a relatively low probability exists that pathogens of risk groups 2 or 3 are present. **Specimens transported for the purpose of initial diagnosis for other than the presence of pathogens or specimens transported for routine screening tests fall within this Group:**

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